

EXHIBIT 6

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

JASON WILLIAMS,
Plaintiff,

ORIGINAL

vs.

Case No. 5:19-cv-00475-BO

AT&T MOBILITY, LLC,
Defendant.

HIGHLY CONFIDENTIAL
DEPOSITION OF ROBERT ARNO
30(b)(6)

February 28, 2022

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12:03 p.m. to 4:27 p.m. EST

REMOTELY REPORTED VIA VIDEO CONFERENCING

REPORTED BY:

Tamara L. Houston
CA CSR No. 7244, RPR, CCRR No. 140
FILE NO. 22-108895

1 MS. STAGG: Thank you.

2 THE VIDEOGRAPHER: Okay. We are going off
3 the record at 4:08 p.m. Eastern time.

4 (Recess: 4:08 p.m. to 4:19 p.m.)

16:18:52 5 THE VIDEOGRAPHER: Okay. We are back on
6 the record at 4:19 p.m. Eastern time.

7 You may proceed.

8 MR. GALLO: Thank you.

9 BY MR. GALLO:

16:19:01 10 Q. Mr. Arno, you testified earlier that you
11 have reviewed Mr. Williams' account notes, but you
12 didn't review the printed out version we were showing
13 you in this deposition; is that correct?

14 A. Correct.

16:19:19 15 Q. And I think you testified that you reviewed
16 a different version -- or a version of the account
17 notes that's viewable on AT&T's system; is that
18 correct?

19 A. Correct.

16:19:32 20 Q. Is -- is that -- are those notes viewable
21 through a particular program or system? Does it have
22 any sort of name?

23 A. It's notations in Telegence.

24 Q. Notations in Telegence.

16:19:47 25 A. Correct.

1 Q. And using that program -- or is that a
2 program on your work computer?

3 A. Yes.

4 Q. And using that program, you're able to view
16:20:00 5 customer account notes, correct?

6 A. Correct.

7 Q. Do you see any sort of radio buttons or
8 special indicators on customer account notes through
9 that system?

16:20:23 10 A. You mean -- there's a special instructions
11 indicator.

12 Q. Okay. Is there a special instructions
13 indicator in -- if there are special instructions on
14 a customer account, do you have any sort of indicator
16:20:37 15 that those special instructions are on the account
16 when you view them through the notations in Telegence
17 system?

18 A. You'd have to kind of deduce which special
19 instructions were on the account on a specific date
16:20:55 20 and time. As I mentioned before --

21 Q. Okay.

22 A. -- the radio button just alerts the user
23 there are special instructions, but it only has the
24 last set of special instructions. So if I wanted to
16:21:10 25 see what special instructions were on the account,

1 let's say, on November 15th, 2020, I'd have to
2 actually go back in time in the notes and do it
3 manually.

4 Q. Okay. I understand that.

16:21:24 5 For the current, sort of most recent note,
6 does that have any sort of indicator that you can see
7 without searching for it?

8 A. It has a black radio button that indicates
9 there are special instructions on the account.

16:21:40 10 Q. Okay. So I think you testified that
11 that -- to your knowledge, that black radio button
12 appears in Telegence and that -- a similar or the
13 same black radio button also appears when you look at
14 account notes in the notations in Telegence system
16:21:56 15 that you're talking about right now?

16 MS. STAGG: Objection. Misstates his
17 testimony.

18 BY MR. GALLO:

19 Q. Is that correct?

16:22:06 20 A. My understanding is in the other system
21 that's customer-facing, OPUS, you can also use
22 special instructions. I don't know how it's
23 displayed.

24 Q. Okay. I guess I'm a little confused, then.
16:22:21 25 So let's leave OPUS to one side.

1 I think were you testifying earlier about
2 something called Telegence as a way to view account
3 notes and that is distinct from OPUS; is that
4 correct? Am I remembering that correctly?

16:22:42 5 A. So OPUS feeds into Telegence, so I can see
6 what's being done in OPUS by reviewing notes in
7 Telegence. I don't know if that answers your
8 question correctly or not.

9 Q. I think maybe I'm just -- I didn't
16:22:58 10 understand your previous testimony. So the -- when
11 you're looking at the notes through the program you
12 just referenced, notations in Telegence, you are
13 looking at the notes in Telegence?

14 A. Correct.

16:23:14 15 Q. Okay. Now I understand.

16 So as a result, the black radio button that
17 you were describing earlier that corresponds to the
18 most recent special instructions appears in -- when
19 you view it through notations in Telegence?

16:23:31 20 A. Correct.

21 MR. GALLO: All right. At this time, I am
22 finished with my questions. I'm happy to end the
23 deposition and reserve any additional time. I don't
24 know if you want to do any redirect, Ms. Stagg.

16:23:46 25 MS. STAGG: Nope. No, we're good.